

IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

VS

CA NO. 06-778-GMS.

THOMAS L. CARROLL, ET AL.



PD scanned 4

STATEMENTS IN SUPPORT #2,  
OF PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION, DE 60.61,  
PURSUANT TO FED R. CIV P #65.

DATE: 4/8/08

Jimmie Lewis  
SBI # 506622  
DEL. CORR. CENTER.  
1181 PADDOCK RD  
SMYRNA, DE 19977

1.) THE PLAINTIFF, FOR ALL THE REASONS STATED, AS WELL AS HEREIN, VIEWS HIS CONTINUED CONFINEMENT IN THE DELAWARE D.O.C, I.E., THE DELAWARE CORRECTIONAL CENTER AS A VICIOUS CYCLE OF HIS U.S CONSTITUTIONAL RIGHTS BEING VIOLATED; DUE TO HIS FILING CIVIL COMPLAINTS 04-1350 GMS, 05-013 GMS, AND 06-778 GMS; FOR WHICH DEFINE MATERIAL FACT

1 ST U.S.CA RIGHT VIOLATION(S).

2.) THE DEFENDANTS NAMED IN CA NO'S - 04-1350 GMS, 05-013 GMS AND 06-778 GMS ARE EXCEPTIONALLY NUMEROUS, SPANNING THE D.P.C, D.C.C AND HRYCE, ANYWHERE THE PLAINTIFF CAN POSSIBLY BE TRANSFERRED TO HERE IN THE STATE OF DELAWARE, AND ARE THE VERY PERSONS UNDER COLOR OF STATE LAW THAT THE PLAINTIFF MUST RELY ON FOR MEDICAL TREATMENT, MENTAL HEALTH TREATMENT, AS WELL AS HIS ALL AROUND PHYSICAL SAFETY AND WELL BEING, DUE TO THE DEFENDANTS BEING THE CUSTODIANS WHOM CONTROL THE PLAINTIFF'S CONDITIONS OF CONFINEMENT.

- 3.) DR. CAVANNAUGH'S MOTION FOR THE PLAINTIFF TO BE EVALUATED FOR COMPETENCY, AND TO RECEIVE TREATMENT FOR HIS VERY OWN WELL BEING, DATED 5/17/07, ID NO; 0305016966, AT THE D.P.C, CREATED THE PLAINTIFFS LIBERTY INTEREST, FOR HIM TO RECEIVE THERAPY AND OR TREATMENT FOR ANY ALLEGED BEHAVIOR PROBLEM, PURSUANT TO DELAWARE STATE STATUTES 11 DEL C 6531, 6536, 6535, 6525, 6524, 6502, 6517.; FOR WHICH THE DEFENDANTS VIOLATED WHEN THEY UTILIZED EXCESSIVE FORCE TO TRANSFER HIM BACK TO THE D.C.C WITHOUT CONDUCTING A COMPETENCY HEARING, AND OR WITHOUT AN OFFICIAL COURT ORDER DOCKETED WITH THE N.C.C SUPERIOR COURT PROTHONOTARY'S OFFICE, ID NO. 0305016966.  
6TH, 8TH AND 14TH U.S CA RIGHT VIOLATION
- 4.) LT SATTERFIELD WONT LET THE PLAINTIFF MAKE LEGAL PHONE CALLS TO THE PUBLIC DEFENDERS OFFICE TO SPEAK WITH MICHELLE NARDOZZI, AND OR JOHN S. EDIGER JR, HIS CRIMINAL CASE ATTORNEYS. 1ST U.S CA RIGHT VIOLATION
- 5.) DR. CANNOLI IS NAMED AS A DEFENDANT 06-7786MS, AS WELL AS IN THE PLAINTIFF MOTION FOR PRELIMINARY INJUNCTION.

6.) THE PLAINTIFF IS DENIED MEDICAL, AND MENTAL HEALTH TREATMENT, UNLIKE OTHER INMATES, DUE TO CIVIL COMPLAINTS HE HAS FILED AGAINST DEFENDANTS AT EITHER D.C.C., ~~ORA~~, HRYCI OR D.P.C, AS WELL AS DUE TO INTIMIDATION OF SAID MEDICAL STAFF MEMBERS BY CORRECTIONAL OFFICERS 1ST & 8TH USCA VIOLATIONS

7.) THE DEFENDANTS, CA NO 06-778 GMS WON'T TRANSFER THE PLAINTIFF TO HIS NEXT LEVEL OF COMMITMENT

6TH USCA RIGHT VIOLATION.

8.) CORRECTIONAL OFFICERS ARE STOCKPILING FABRICATED INCIDENT REPORTS AGAINST THE PLAINTIFF, IN ORDER TO OBTAIN AN UNFAIR TACTICAL ADVANTAGE OF JUDICIAL STRATEGY OF DEFENSE AGAINST THE PLAINTIFFS CIVIL COMPLAINTS, I.E., ~~IN~~ VIA DISCOVERY, AND HARASSING THE PLAINTIFF, AS WELL AS SEEKING TO PLACE CRIMINAL CHARGES AGAINST HIM WITHOUT PROVIDING HIM WITH FAIR DUE PROCESS.

1ST, & 14TH USCA RIGHT VIOLATIONS

9.) THE PLAINTIFF HAS FILED GRIEVANCES,  
BUT TO NO AVAIL.

### PRELIMINARY INJUNCTION

FOR AN ORDER TO POSTPONE THE RULING  
ON THE MOTION FOR PRELIMINARY INJUNCTION  
UNTIL THE DEFENDANTS HAVE PROVIDED,

1. THE PLAINTIFF'S HOUSING RECORDS,
- 2.) HIS MEDICAL RECORDS
- 3.) HIS MENTAL HEALTH RECORDS
- 4.) HIS INCIDENT REPORTS
- 5.) GRIEVANCES

ALL DATING FROM 12/14/07,  
THE TIME SINCE HE HAS BEEN  
TRANSFERRED BACK TO THE D.C. FROM  
THE D.P.C

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS  
DOE HEREBY CERTIFY ON THIS 8TH DAY OF APRIL,  
2008 THAT I DID MAIL ONE TRUE AND CORRECT  
COPY OF STATEMENT IN SUPPORT # 2. OF  
PLAINTIFFS MOTION FOR PRELIMINARY  
INJUNCTION BY U S POSTAL, TO THE FOLLOWING:

CLERK OF THE COURT GMS  
U.S DISTRICT COURT  
844 N. KING ST LOCKBOX 18  
WILM, DE 19801

ERIKA Y TRASS  
DEPT ATTORNEY GEN  
820 N. FRENCH ST  
WILM, DE 19801

DATE: 4/8/08

Jimmie Lewis  
SBI #506622  
D.C.C  
1181 PADDOCK RD  
SMYRNA, DE 19977



I/M Timoné Lewis  
SBI# 506622 UNIT SHU 17, A21  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977



CLERK OF THE COURT (GMS)  
U.S. DISTRICT COURT  
844 N. KING ST COCKBOX 18  
WILM, DE 19801

19801+3513

